



ORIGINAL

LEVENTHAL SENTER & LERMAN PLLC

EX PARTE OR LATE FILED November 7, 2002

RAUL R. RODRIGUEZ
(202) 416-6760

E-MAIL
RRODRIGUEZ@LSL-LAW.COM

RECEIVED

NOV - 7 2002

BY HAND DELIVERY

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Ex Parte Presentation in IB Docket No. 02-10

Dear Ms. Dortch:

On November 6, 2002, representatives of Maritime Telecommunications Network, Inc. ("MTN") met with members of the International Bureau in connection with the above-referenced proceeding. During the meeting, MTN described suggested coordination procedures that could be used at various port operating areas to protect terrestrial services operating in the C-band from the co-frequency operations of satellite earth stations on board vessels ("ESVs"). MTN also distributed copies of a letter from the Chief Technical Officer of Pinnacle Telecom Group, LLC, attesting to the feasibility of these procedures. A summary of the suggested coordination procedures that was distributed during the meeting and a copy of the letter from Pinnacle Telecom Group are enclosed.

MTN also discussed how the Commission's existing earth station authorization application form (FCC Form 312, Schedule B) could be revised to accommodate ESV licensing, using the port of Miami, Florida as an example. MTN distributed sample copies of a revised Form 312, Schedule B to demonstrate one means of modifying the form. A copy of that revised form, with revisions to the existing form marked in red, is enclosed.

No. of Copies rec'd 0+1
List ABCDE



Ms. Marlene Dortch
November 7, 2002
Page -2-

The original and one copy of this letter are provided for inclusion in the above-referenced proceeding. Please address any questions concerning this matter to the undersigned.

Respectfully submitted,

Raul R. Rodriguez
Counsel to Maritime Telecommunications Network, Inc.

Enclosure

cc w/ enclosure (by e-mail): Claudia Fox
Belinda Nixon
Ed Jacob
Lisa Cacciatore

Phase II – Prior Coordination of Port Operating Area

1. Using the database of licensed stations in the fixed service operating in the frequency bands of interest, identify all of the potential victim receivers that are within the composite coordination area and the frequencies they are assigned.
2. If there are any frequencies within the band of interest that are not used by any of the potential victim receivers identified in Step 11.1, these frequencies may be identified for use by the ESV within the port operating area without further analysis.
3. The potential for interference must be determined where there are potential conflicts with existing users in the band. To perform this analysis, the worst-case position of the ship within the port operating area for causing interference to each victim must be identified. This point is called the critical contour point (CCP). The procedure for choosing the CCP for each potential victim receiver and assessing the potential for interference is described in ITU-R Rec. SF-[ESV-C].
4. An interference analysis is performed at each CCP for the associated victim receiver using industry-standard procedures for assessing the potential for interference from a fixed-satellite service earth station into a fixed service receiver (see NSMA Recommendation WG3-90.25). This analysis may be a simple free-space loss calculation or it may include OH-loss and knowledge of the topography. The results of this analysis indicate whether the interfering signal is likely to exceed the interference objective and if so, by how much.
5. Frequencies that exceed the interference objective generally would not be assigned for ESV use in that port operating area. However, there might be some mitigating circumstances or limitations that could be negotiated between the coordinator for the fixed service station and the coordinator for the ESVs (see Step II. 7).
6. All coordinators for the potential victim receivers would receive a letter with details of the analysis and the results so that they can assess the situation themselves and either verify or contest the conclusions reached by the coordinator for the **ESVs**. The details sent to coordinators for each victim receiver should include:
 - a. The operational parameters of the type(s) of ESV including the azimuth and elevation angles;
 - b. A map of the port operating area and the composite coordination area;

- c. The coordinates of the CCP identified as the point within the port operating area that could potentially cause the worst-case interference;
 - d. The distance from the CCP to the victim receiver; and
 - e. The discrimination angle and the gain at that angle for both the type(s) of ESV and the victim receiver that have been used in the analysis.
7. To the extent that the coordinators representing the potential victims have some objections to the results of the analysis and/or that there may be mitigating circumstances for some frequencies that the frequency coordinator for the potential victim can accept in order to clear a frequency for use, ad-hoc negotiations could occur. This type of negotiation is a commonly accepted procedure for coordination between fixed-satellite stations and **fixed** service stations.
 8. Create the list of frequencies for which the analysis shows there is no potential to cause interference. This list may also include the cases negotiated in Step 11.7 where the frequency coordinator for the fixed service station has agreed to allow operation.

Phase III – Preparation of FCC Form 312 Schedule B

1. Schedule B of the FCC Form 312 license application should give the technical description of the hub and associated type(s) of ESV terminals in the network as well as the results for prior frequency coordination in each port operating area.
2. The frequency coordination information provided to support the application should include:
 - a. A map of the port area indicating the berths, channels and sea-lanes **making** up the operating area and the break points and the resulting composite coordination area;
 - b. A list of the break points and their coordinates used in performing the analysis;
 - c. A list of the frequencies that have been cleared for use in the port operating area; and
 - d. The letter of certification from the coordinator who performed the analysis.



PINNACLE TELECOM GROUP, LLC

Consulting and Engineering Services

www.pinnacletelecomgroup.com

November 5, 2002

Donald Abelson
Chief, International Bureau
Federal communications Commission
445 12th Street, SW
Washington, DC 20554

SUBJECT: Written *Ex Parte* Comments in **IB Docket 02-10 –**
Interference Analysis **and** Frequency Coordination for
C-Band Earth Stations Operated **Aboard Vessels (ESVs)**

Dear Mr. Abelson,

At the request of Dr. Robert Hanson of Maritime Telecommunications Network, Inc., (MTN), I have reviewed material on procedures for analyzing potential RF interference, performing frequency coordination, and submitting license applications for ESVs operating in frequency bands shared with point-to-point microwave systems.

My staff and I have been involved in ESV coordination since early 1997, when many of us were working for Edwards and Kelcey, and we have continued that work since forming Pinnacle Telecom Group in early 2000. We have also been continuously involved in ESV coordination discussions in the National Spectrum Managers Association (which I currently serve as president), as well as in periodic discussions with the FCC staff.

All of the material we reviewed is fundamentally consistent with the approach we have used in all ESV coordination to date, involving multiple clients (including MTN). Once the ESV operating contour has been defined and critical contour points identified, the analysis methodology relies on exactly the same mathematical analysis as has been used for earth station coordination since the early 1970s.

We are firm believers in the spectrum management principle that if some new sharing proposal can be demonstrated to work from an interference point of view, then it should be allowed by the FCC. With the described interference analysis and coordination procedure, C-band ESV operations match that criteria.

14 RIDGEDALE AVENUE – SUITE 262 CEDAR KNOLLS, NJ 07927 973-451-1630

Moreover, given the Significant geographic limitations of ESV operations (i.e., the limited number of deep-draft ports along the coastline), there is no real impact on the other services using the bands already shared on a primary co-equal basis by microwave and satellite operations.

We believe the interference analysis methodology and frequency coordination procedures described in the material we reviewed (and also under development within the ITU radio communications sector) are not only workable, they have been specifically demonstrated in US industry practice over some time now to work, and work effectively. Except for the minor fine-tuning of certain parameters, the described procedure has been used by my staff in coordinating ESV operations in nearly two dozen US ports and the Gulf of Mexico.

I am available for further discussion or to answer questions on this topic, and I can be reached via phone at 973-451-1630 on extension 102, or via email at dancollins @pinnacletelecomgroup.COM.

Regards,


Daniel J. Collins
Chief Technical Officer

**FEDERAL COMMUNICATIONS COMMISSION
SATELLITE EARTH STATION AUTHORIZATIONS
FCC Form 312 - Schedule B: (Technical and Operational Description)**

**Page 2: Antennas
ESV Hub**

B4. Earth Station Antenna Facilities: Use additional pages as needed.

(a) Site ID*	(b) Antenna ID/Terminal **	(c) Quantity	(d) Manufacturer	(e) Model	(f) Antenna/Terminal Size (meters)	(g) Antenna/Terminal Gain Transmit and/or Receive (dBi at GHz)
Hub	16.4M	1	VERTEX	16.4THC	16.4	(T) 58.6 dBi at 6.175 GHz

B5. Antenna Heights and Maximum Power Limits: (The corresponding antenna ID in tables B4 and B5 applies to the same antenna)

(a) Antenna/Terminal ID**	(b) Antenna Structure Registration No.	Maximum Antenna Height		(e) Building Height Above Ground Level (meters) ***	(f) Maximum Antenna Height Above Rooftop (meters) ***	(g) Total Input Power at Antenna Flange (Watts)	(h) Total EIRP for all carriers (dBW)
		(c) Above Ground (meters)	(d) Above Mean Sea Level (meters)				
16.4M		17.4	121.0	N/R	N/R	500 W	85.6

Notes: * If this is an application for a VSAT or ESV network, identify the site (Item B1b, Schedule B, Page 1) where each antenna is located or where each terminal will operate. Also include this Site-ID on Schedule B, Page 5.
 ** Identify each antenna in VSAT/ESV network or multi-antenna station with a unique identifier, such as HUB, REMOTE1, A1, A2, 10M, 12M, 7M, etc. Use this same antenna ID throughout labels B4, B5, B6, and B7 when referring to the same antenna.
 *** Attach sketch of site or exemption, See 47 CFR Part 17.

SAMPLE REPORT

FREQUENCY COORDINATION AND INTERFERENCE
ANALYSIS REPORT

PREP—ED FOR
MARITIME TELECOMMUNICATIONS NETWORK

MIAMI, FL
SATELLITE EARTH STATION ONBOARD VESSEL (ESV)

PREPARED BY
COMSEARCH
19700 Janelia Farm Boulevard
Ashburn, Virginia 20147
November 4, 2002

SAMPLE REPORT

TABLE OF CONTENTS

1. CONCLUSIONS
 2. SUMMARY OF RESULTS
 3. SUPPLEMENTAL SHOWING, RE: PART 25.203(C)
 4. EARTH STATION COORDINATION DATA
 5. CERTIFICATION
-

SAMPLE REPORT

1. CONCLUSIONS

AN INTERFERENCE STUDY CONSIDERING ALL EXISTING, **PROPOSED** AND PRIOR COORDINATED MICROWAVE FACILITIES WITHIN THE COORDINATION CONTOURS **OF** THE PROPOSED EARTH STATION ONBOARD **VESSEL** (ESV) DEMONSTRATES THAT **THIS** SITE WILL **OPERATE** SATISFACTORILY WITH **THE** COMMON CARRIER **MICROWAVE** ENVIRONMENT BASED UPON THE RESTRICTIONS NOTED IN THE **SUMMARY OF RESULTS** (SECTION **2**) .

SAMPLE REPORT

2. SUMMARY OF RESULTS

A NUMBER OF GREAT CIRCLE INTERFERENCE CASES WERE IDENTIFIED DURING THE INTERFERENCE STUDY OF THE PROPOSED EARTH STATION ONBOARD VESSEL. EACH OF THE CASES WHICH EXCEEDED THE INTERFERENCE OBJECTIVE ON A LINE-OF-SIGHT BASIS WAS ANALYZED AND RESOLVED USING PROFILES AND THE PROPAGATION LOSSES ESTIMATED USING NBS TN101 (REVISED) TECHNIQUES OR FREQUENCY OFFSET. THE LOSSES AND/OR FREQUENCY OFFSET WERE FOUND TO BE SUFFICIENT TO REDUCE THE SIGNAL LEVELS TO ACCEPTABLE MAGNITUDES IN EVERY CASE. **THE MIAMI** ESV WILL ONLY OPERATE WITHIN THE FOLLOWING FREQUENCY BAND TO ENSURE THAT NO INTERFERENCE WILL OCCUR: 6172-6206 MHZ.

THE FOLLOWING COMPANIES REPORTED POTENTIAL GREAT CIRCLE INTERFERENCE CONFLICTS WHICH DID NOT MEET THE OBJECTIVES ON A LINE-OF-SIGHT BASIS. WHEN OVER-THE-HORIZON LOSSES AND FREQUENCY OFFSET ARE CONSIDERED ON THE INTERFERING PATHS, SUFFICIENT BLOCKAGE EXISTS TO NEGATE HARMFUL INTERFERENCE FROM OCCURRING WITH THE PROPOSED TRANSMIT AND RECEIVE EARTH STATION.

COMPANY

PALM BEACH COUNTY FAC DEV & OP
VERIZON PERSONAL COMMUNICATIONS, L.P. (FL)
SOUTH FLORIDA WATER MANAGEMENT DISTRICT
PALM BEACH COUNTY FAC DEV & OP
FLORIDA POWER AND LIGHT COMPANY
CINGULAR WIRELESS, LLC - FL RGN
AT&T WIRELESS SERVICES OF FL INC - FL

NO OTHER CARRIERS REPORTED POTENTIAL INTERFERENCE CASES.

SAMPLE REPORT

3. SUPPLEMENTAL SHOWING
RE: PART 25.203(C)

PURSUANT TO PART 25.203(C) OF THE FCC RULES AND REGULATIONS, THE SATELLITE EARTH STATION PROPOSED IN THIS APPLICATION WAS COORDINATED BY COMSEARCH USING COMPUTER TECHNIQUES AND IN ACCORDANCE WITH PART 25 OF THE FCC RULES AND REGULATIONS.

COORDINATION DATA FOR THIS EARTH STATION WAS SENT TO THE BELOW LISTED CARRIERS WITH A LETTER DATED NOVEMBER 4, 2002.

AT&T WIRELESS SERVICES OF FL INC - FL
CENTRAL FLORIDA CELLULAR TELEPHONE CO
CINGULAR WIRELESS, LLC - FL RGN
FLORIDA CELLULAR SERVICE, LLC
FLORIDA POWER AND LIGHT COMPANY
M/A COM PRIVATE RADIO SYSTEMS, INC.
PALM BEACH COUNTY FAC DEV & OP
SOUTH FLORIDA WATER MANAGEMENT DISTRICT
SPRINT FLORIDA, INC.
VERIZON PERSONAL COMMUNICATIONS, L.P. (FL)
WIRELESS ONE HLD CO DBA CELLONE OF SWFLA

SAMPLE REPORT

4. EARTH STATION COORDINATION DATA

THIS SECTION PRESENTS THE DATA PERTINENT TO FREQUENCY COORDINATION OF THE PROPOSED EARTH STATION, WHICH WAS CIRCULATED TO ALL COMMON CARRIERS WITHIN ITS COORDINATION CONTOURS.

SAMPLE REPORT

SATELLITE EARTH STATION
FREQUENCY COORDINATION DATA
10/31/2002

Company	MTN	
Earth Station Name, State		MIAMI, FL
Latitude (DMS) (NAD83)		25 46 29.0 N
Longitude (DMS) (NAD83)		80 9 55.0 W
Ground Elevation A MSL (Ft/m)		0.00 / 0.00
Antenna Centerline e AGL (Ft/m)		79.99 / 24.38
Transmit Antenna Type:	FCC32	FCC Reference
		32-25LOG (THETA)
6.0 GHz Gain (dBi) / Diameter (m)		40.8 / 2.4
3 dB / 15 dB Half Beamwidth		0.50 / 1.40
Operating Mode		TRANSMIT ONLY
Modulation		ANALOG
Emission / Transmit Band (MHz)		36M0F8W / 6172-6206 MHz
Max. Available RF Power (dBW)/4 kHz		-7.00
(dBW)/MHz		17.00
Max. EIRP (dBW)/4 kHz		33.80
(dBW)/MHz		57.80
(dBW)		0.00
Max permissible Interference Power		
6.0 GHz, 20% (dBW/4 kHz)		-154.0
6.0 GHz, 0.0025% (dBW/4 kHz)		-131.0
Range of Satellite Arc (Geostationary)		
Azimuth Range D (Min/Max) Longitude		41.0 W / 103.0 W
Corresponding Elevation Angles		118.1 / 224.1
		37.4 / 50.6
Radio climate		B
Rain zone		2
Max Great circle Coordination Distance (Mi/Km)		
6.0 GHz		118.9 / 191.3
Precipitation scatter Contour Radius (Mi/Km)		
6.0 GHz		62.1 / 100.0

Note: ~~Horizon~~ is less than 0.2 degrees at all azimuths

SAMPLE REPORT

Table of Earth Station Coordination Values
10/31/2002

Earth station Name MIAMI FL
 Owner MTN
 Latitude (DMS) (NAD83) 25 46 29.0 N
 Longitude (DMS) (NAD83) 80 9 55.0 W
 Ground Elevation (Ft/m) 0.00 / 0.00 AMSL
 Antenna centerline (Ft/m) 79.99 / 24.38 AGL
 Antenna Model FCC Reference 32-25LOG(THETA)
 Objectives: Transmit -154.0 (dBW /4 kHz) TX Power -7.0 (dBW/4 kHz)

Azimuth (Deg)	Horizon Elevation Angle (Deg)	Antenna Disc. Angle (Deg)	6.0 GHz	
			Antenna Gain (dBi)	Coordination Distance (Km)
0	0.00	111.98	-10.00	177.2
5	0.00	108.16	-10.00	111.2
10	0.00	104.29	-10.00	111.2
15	0.00	100.31	-10.00	171.2
20	0.00	96.43	-10.00	111.2
25	0.00	92.46	-10.00	171.2
30	0.00	88.49	-10.00	111.2
35	0.00	84.52	-10.00	177.2
40	0.00	80.51	-10.00	111.2
45	0.00	76.64	-10.00	177.2
50	0.00	72.76	-10.00	171.2
55	0.00	68.93	-10.00	117.2
60	0.00	65.11	-10.00	111.2
65	0.00	61.50	-10.00	111.2
70	0.00	51.95	-10.00	117.2
75	0.00	54.53	-10.00	177.2
80	0.00	51.29	-10.00	117.2
85	0.00	48.26	-10.00	171.2
90	0.00	45.49	-9.45	180.0
95	0.00	43.04	-8.85	383.1
100	0.00	40.95	-8.31	186.0
105	0.00	39.29	-7.86	188.4
110	0.00	38.12	-7.53	190.2
115	0.00	31.49	-7.35	191.1
120	0.00	31.42	-7.33	191.3
125	0.00	37.92	-1.47	190.5
130	0.00	38.96	-7.77	188.9
135	0.00	40.51	-8.19	186.6
140	0.00	42.50	-8.71	183.9
145	0.00	44.88	-9.30	180.8
150	0.00	41.58	-9.94	177.6
155	0.00	50.55	-10.00	171.2
160	0.00	53.58	-10.00	177.2
165	0.00	56.11	-10.00	111.2
170	0.00	58.17	-10.00	171.2
175	0.00	59.44	-10.00	111.2
180	0.00	59.87	-10.00	117.2

SAMPLE REPORT

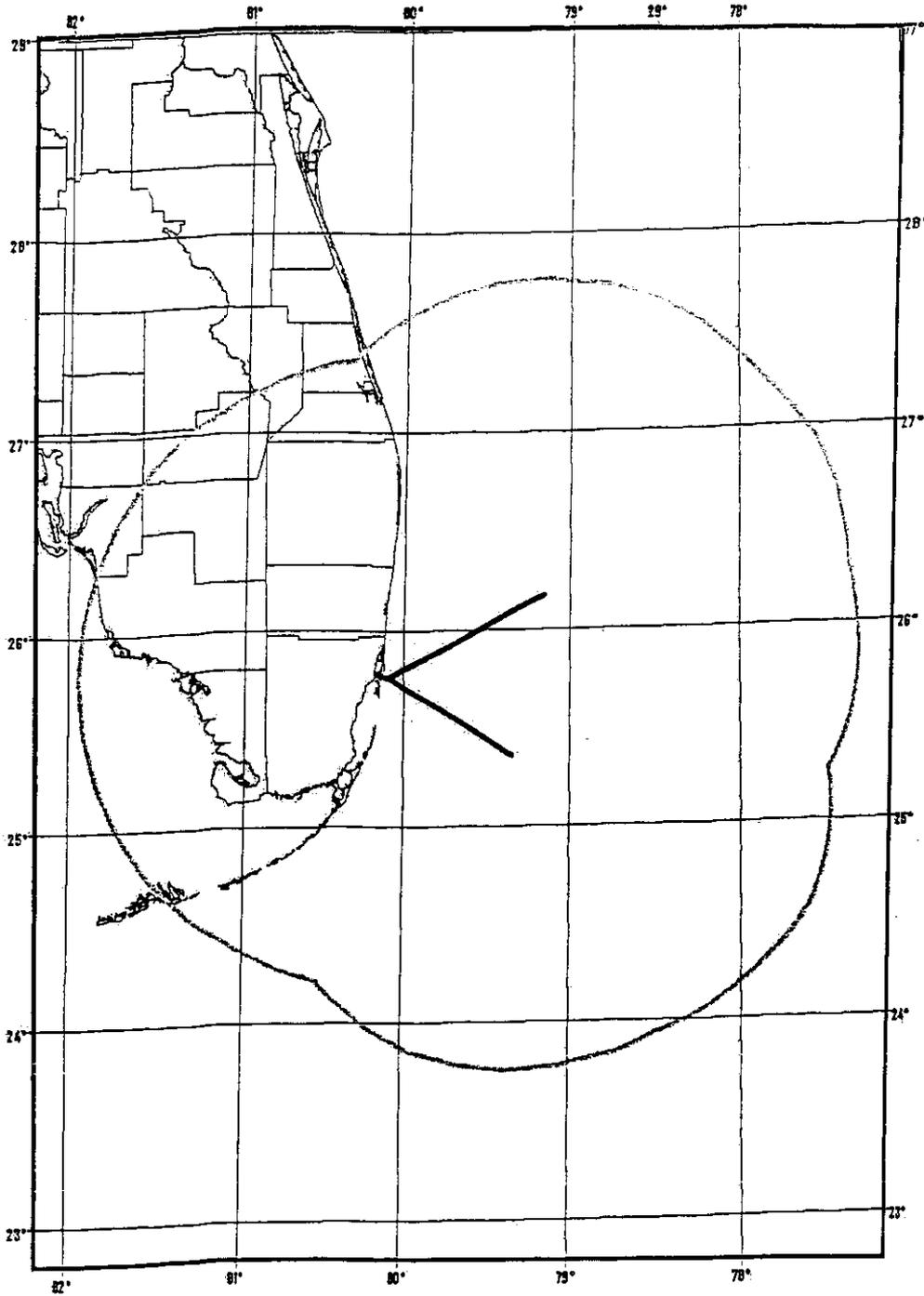
Table of Earth Station Coordination Values
10/31/2002

Earth Station Name **MIAMI FL**
 owner **MTN**
 Latitude (DMS) (NAD83) **25 46 29.0 N**
 Longitude (DMS) (NAD83) **80 9 55.0 W**
 Ground Elevation (Ft/m) **0.00 / 0.00 AMSL**
 Antenna Centerline (Ft/m) **79.99 / 24.38 AGL**
 Antenna Model **FCC Reference 32-25LOG (THETA)**
 Objectives: Transmit **-154.0 (dBW /4 kHz) TX Power -7.0 (dBW/4 kHz)**

Azimuth (Deg)	Horizon Elevation Angle (Deg)	Antenna Disc. Angle (Deg)	6.0 GHz	
			Antenna Gain (dBi)	Coordination Distance (Km)
185	0.00	59.44	-10.00	177.2
190	0.00	58.17	-10.00	177.2
195	0.00	56.29	-10.00	177.2
200	0.00	54.57	-10.00	177.2
205	0.00	53.12	-10.00	177.2
210	0.00	51.98	-10.00	177.2
215	0.00	51.17	-10.00	177.2
220	0.00	50.70	-10.00	177.2
225	0.00	50.59	-10.00	177.2
230	0.00	50.83	-10.00	177.2
235	0.00	51.43	-10.00	177.2
240	0.00	52.37	-10.00	177.2
245	0.00	53.62	-10.00	177.2
250	0.00	55.18	-10.00	177.2
255	0.00	57.00	-10.00	177.2
260	0.00	59.06	-10.00	177.2
265	0.00	61.33	-10.00	177.2
270	0.00	63.79	-10.00	177.2
275	0.00	66.41	-10.00	177.2
280	0.00	69.16	-10.00	177.2
285	0.00	72.03	-10.00	177.2
290	0.00	74.99	-10.00	177.2
295	0.00	78.02	-10.00	177.2
300	0.00	81.12	-10.00	177.2
305	0.00	84.25	-10.00	177.2
310	0.00	87.41	-10.00	177.2
315	0.00	90.59	-10.00	177.2
320	0.00	93.76	-10.00	177.2
325	0.00	96.91	-10.00	177.2
330	0.00	100.03	-10.00	177.2
335	0.00	103.11	-10.00	177.2
340	0.00	106.12	-10.00	177.2
345	0.00	109.04	-10.00	177.2
350	0.00	111.87	-10.00	177.2
355	0.00	114.58	-10.00	177.2

SAMPLE REPORT

MIAMI ESV GREAT CIRCLE COORDINATION CONTOUR



MIAMI Coordination Contour w/ Extensions



SAMPLE REPORT

Miami ESV Route Break Points

ID	SITE1	Latitude (deg)	(min)	(sec)	Longitude (deg)	(min)	(sec)
1	BrkPnt 1	25	46	47.35	80	10	53.40
2	BrkPnt 2	25	46	37.35	80	10	9.16
3	BrkPnt 3	25	46	26.35	80	9	48.16
4	BrkPnt 4	25	46	11.35	80	8	56.16
5	BrkPnt 5	25	46	1.35	80	8	22.16
6	BrkPnt 6	25	46	41.35	80	7	35.16
7	BrkPnt 7	25	45	21.35	80	6	54.16
8	BrkPnt 8	25	45	32.35	80	5	54.15
9	BrkPnt 9	26	10	13.30	79	9	10.96
10	BrkPnt 10	25	21	25.40	79	20	4.97

SAMPLE REPORT

5. CERTIFICATION

I HEREBY CERTIFY THAT I AM THE TECHNICALLY QUALIFIED PERSON RESPONSIBLE FOR THE PREPARATION OF THE FREQUENCY COORDINATION DATA CONTAINED IN THIS APPLICATION, THAT I **AM** FAMILIAR WITH PARTS 101 **AND** 25 OF THE FCC RULES AND REGULATIONS, THAT I HAVE EITHER PREPARED OR REVIEWED THE FREQUENCY COORDINATION DATA SUBMITTED WITH THIS APPLICATION, **AND THAT IT IS COMPLETE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.**

BY: _____

JEFFREY E. COWLES
SENIOR FREQUENCY COORDINATOR
COMSEARCH
19700 Janelia Farm Boulevard
Ashburn, Virginia 20147

DATED: November 4, 2002